

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S SECOND SET  
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
UNITED STATES POSTAL SERVICE WITNESS NERI (PR/USPS-T-4: 4-10)

(January 31, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

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**PR/USPS-T-4-4**

In questions PR/USPS-T-4-1 (b) you were asked to provide “empirical evidence illustrating ‘excess capacity’ for the mail processing network”, the supporting calculations and data. In your response to PR/USPS-T-4-1 (b) you refer to USPS-LR-N2012-1/44.

- a. Please, confirm that data provided in the worksheet ‘Data’ are extracted from MODS database or calculated using data from the MODS database. If not confirmed, please, provide the source of the data. Also please provide all formulas that were used to calculate data provided in the fields in worksheet ‘Data’.
- b. Please, provide the description of the fields (SumOfMach\_cnt, SumOfRun Time, etc) in worksheet ‘Data’.
- c. Records provided in the worksheet data refer to a one year period from October 1, 2010 to September 30, 2011. Have you made any comparative calculations for the prior years?
- d. Please explain why Down Time is included as part of Processing Time, and how it differs from Idle Time?
- e. Please confirm that the difference between Window Time and Operating Time is time a machine is not down and not idle. If confirmed, please explain whether the Postal Service has a term for this amount of time, and please provide the name of the term (and definition, if different from the above description).
- f. What is the acceptable idle time in accordance with your analysis or other reliable analysis?
- g. In accordance with machine functionality, could the machines operate without idle time?
- h. Would the decrease of idle time increase the costs for maintenance? Please provide the details if any analysis is available.

#### **PR/USPS-T-4-5**

Please refer to LR-USPS-N2012-1/45- Materials Responsive to PR USPS-T4-3, LR45(Neri).xls.

- a. Please confirm that witness Bradley calculated the reduction of in-plant support using USPS-LR-20, Create MODS Hours File.Sas and his knowledge of which finance numbers would be discontinued in the realigned network?
- b. If confirmed, please explain how this file was used in the proposed network realignment. Please identify any and all calculations or data cells that were used as inputs into other files submitted by the Postal Service, and identify those files.

#### **PR/USPS-T-4-6**

Please refer to LR-USPS-N2012-1/45, Materials Responsive to PR USPS-T4-3, LR45(Neri).xls. In the worksheet 'Assumptions' you state: "Facility Rankings were determined based on the following criteria:

- A weighted index for proposed volume
  - A weighted index for possible number of 5 Digits serviced
  - A weighted index for possible Delivery Points
  - A weighted index for proposed Equipment Count
  - A weighted index for expected Facility Complexity
- a. Please confirm that listed above are five factors that determined a facility ranking. If confirmed, please define complexity and how it was measured. If not confirmed, please explain.
  - b. Please explain the relative ranking of factors. For example: why is facility complexity weighted four times as much as the number of delivery points?

#### **PR/USPS-T-4-7**

Please refer to LR-USPS-N2012-1/45, Materials Responsive to PR USPS-T4-3, LR45(Neri).xls. In the worksheet 'Assumptions' please define the sub-titles named 'OSS Stuffing' and 'OIE Stuffing.'

#### **PR/USPS-T-4-8**

Please refer to LR-USPS-N2012-1/45, Materials Responsive to PR USPS-T4-3, LR45(Neri).xls, worksheet 'P&DC-Annex Rollup'.

- a. Please confirm there are 120 unique finance numbers.
- b. Most of these finance numbers match the finance numbers that will be retained after network realignment, according to USPS-LR-20, FY2010\_MODS\_HOURS\_SAS.xlsx. However, over 20 finance numbers do not match. Please explain why this worksheet does not contain the same finance numbers as the above-mentioned file in USPS-LR-20?

#### **PR/USPS-T-4-9**

Please refer to page 29 and 30 of your testimony, figure 12 'Productivity'. Please provide the calculations, in electronic form, by which you arrived at the productivity improvements for each cost pool shown.

#### **PR/USPS-T-4-10**

Please refer to USPS-LR-N2012-1/57. Please provide a version of this library reference that includes the finance number and/or facility ID for each facility.